

AARON D. FORD
Attorney General
Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General
State of Nevada
Office of the Attorney General
555 E. Washington Ave., #3900
Las Vegas, NV 89101
(702) 486-3825 (phone)
(702) 486-2377 (fax)
JPerlick@ag.nv.gov
Attorneys for Respondents

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PETER COCA,

Petitioner,

vs.

WARDEN BRIAN WILLIAMS, et al.,

Respondents.

Case No. 2:20-cv-01494-KJD-DJA

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO FIRST AMENDED
PETITION (ECF NO. 18)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 30 days from the current due date of March 30, 2022, up to and including April 29, 2022, in which to file their response to Peter Coca's First Amended § Petition (ECF No. 18). This Motion is made pursuant to Fed. R. Civ. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the second enlargement of time sought by Respondents to file the response, and the request is brought in good faith and not for the purpose of delay.

DATED March 30, 2022.

Submitted by:

AARON D. FORD
Attorney General

By: /s/ Jessica Perlick
Jessica Perlick (Bar. No. 13218)
Senior Deputy Attorney General

DECLARATION OF JESSICA PERLICK

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

I, JESSICA PERLICK, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Senior Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Peter Coca v. Renee Baker, et al.*, Case No. 2:20-cv-01494-KJD-DJA, and as such, have personal knowledge of the matters contained herein.

2. The deadline to file Respondents' response to Coca's first amended § petition (ECF No. 18) is March 30, 2022. I requested the previous extension due to a delay in receiving the state court records, which in turn delayed our ability to compile and finalize the index.

3. I have been unable with due diligence to complete the response herein. First, although I believed we had the full state court record, we determined that there were documents missing from the prior batch. We finally received the last documents on March 10, 2022. We have now compiled the record and index but are working to complete the review/redaction process pursuant to LR IC 6-1.

4. During this time, I have also been working to meet other existing obligations, particularly in *Williams v. Gittere*, 2:98-cv-00056, a capital case in which I have an upcoming evidentiary hearing. In the *Williams* matter, I filed a prehearing brief on March 21, 2022, prepared for and participated in a deposition on March 23, 2022, and attended a status conference on March 25, 2022. I have also been working to complete internal training with a new deputy, and filed a reply in *Shue v. Johnson*, 2:20-cv-02025, while continuing to work on the response herein.

5. Unfortunately, at the end of last week, I had a personal emergency that impacted my time and availability. Although I came into the office on Friday morning to attend the *Williams* hearing, the family issue required me to return home immediately thereafter. But exacerbating my time constraints was a network outage in my neighborhood during the same period, which impacted my ability to work from home to make up time. Although the personal family issue is nearly resolved, I am still working to recover the time I lost while dealing with it. As a result, I need to request this extension in which to complete the response to the first amended petition.

